



**PATRICK D. CROCKER**  
[patrick@crockerlawfirm.com](mailto:patrick@crockerlawfirm.com)

February 26, 2013

Ms. Marlene H. Dortch, Commission Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Suite TW-A325  
Washington, DC 20554

*Filed Electronically Via ECFS*

RE: TFL Interstate Long Distance, Inc.  
Customer Proprietary Network Information Certification  
EB Docket No. 06-36

Dear Ms. Dortch:

TFL Interstate Long Distance, Inc., by its undersigned attorneys, hereby submits its 2012 CPNI Compliance Certificate and Accompanying Statement certifying compliance with Section 64.2001 *et seq.* of the Commission's rules.

Please contact the undersigned should you have any questions or concerns at (269) 381-8893 extension 226 or [patrick@crockerlawfirm.com](mailto:patrick@crockerlawfirm.com).

Very truly yours,

CROCKER & CROCKER

  
Patrick D. Crocker

PDC/tld

Enclosures

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2012

Date filed: February 12, 2013

Name of Company Covered by this Certification: TFL Interstate Long Distance, Inc.

Form 499 Filer ID: 828524

Name of Signatory: N. Marie Lewis

Title of Signatory: Chief Executive Officer

I am the Chief Executive Officer of TFL Interstate Long Distance, Inc. and as such do hereby certify, affirm, depose, and say that I have authority to make this Customer Proprietary Network Information ("CPNI") Annual Certification of Compliance on behalf of TFL Interstate Long Distance, Inc.. I have personal knowledge that TFL Interstate Long Distance, Inc. has established adequate operating procedures to ensure compliance with the Commission's CPNI rules as set forth in 47 C.F.R. § 64.2001 *et seq.*

Attached to this Certification is an Accompanying Statement explaining how the company's procedures ensure compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

TFL Interstate Long Distance, Inc. received no customer complaints in the past year concerning the unauthorized release of CPNI. Further, TFL Interstate Long Distance, Inc. has taken no action against data brokers for the unauthorized release of CPNI during calendar year 2012. TFL Interstate Long Distance, Inc. will report any information it may obtain with respect to the processes pretexters are using to attempt to access CPNI and what steps TFL Interstate Long Distance, Inc. is taking to protect CPNI.

This certification is dated this 12 day of Feb, 2013.

  
N. Marie Lewis

Chief Executive Officer

TFL Interstate Long Distance, Inc.

## **Accompanying Statement to Annual CPNI Compliance Certification for**

### **TFL INTERSTATE LONG DISTANCE, INC.**

TFL INTERSTATE LONG DISTANCE, INC. ("TFL") operating procedures ensure that TFL is in compliance with 47 C.F.R. Part 64, Subpart U, as follows:

#### Employee Training and Discipline

- TFL requires all employees as well as, contractors and agents (if applicable) with access to CPNI to sign a Statement of CPNI Acknowledgement, stating that they are to protect the confidentiality of the CPNI and that they are prohibited to use the CPNI information for any purpose other than addressing customer inquiries or for other internal matters that are NOT related to marketing efforts. Failure to follow the Statement may result in disciplinary action or termination of their employment.

#### Sales and Marketing Campaigns

- TFL requires management approval for any and all sales and marketing campaigns to ensure that CPNI is not used.
- TFL does not sell or license CPNI from its product service offerings for third party marketing campaigns.
- TFL ensures that agreements entered into with third party service providers that store CPNI include verbiage that acknowledges such CPNI is TFL's proprietary information and that the service provider is prohibited to use such information for solicitation or for any other purpose outside the terms of the agreement.

#### Record-Keeping Requirements

- TFL does not store CPNI records in its internally maintained databases.
- TFL requires that CPNI records maintained by third party service providers are being maintained for a minimum of one (1) year.

#### Establishment of a Supervisory Review Process

- TFL establishes a supervisory review process for all outbound marketing situations to ensure no CPNI records are being utilized.

#### Opt-In

- TFL does not market CPNI. However, if TFL was to market CPNI it would only disclose CPNI to sales agents, affiliates, joint venture partners, independent contractors or to any other third parties after receiving "opt-in" approval from a customer.
- TFL enters into confidentiality agreements with joint venture partners, independent contractors or any other third party when releasing or storing CPNI. All such confidentiality agreements are reviewed by management for compliance with this Policy.

#### Opt-Out Mechanism Failure

- TFL will not market CPNI. However, if TFL was to market CPNI it would establish a protocol requiring written notice to the FCC within five (5) business days of any instance where opt-out mechanisms did not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly.

#### Compliance Certificates

- TFL executes a statement, signed by an officer, certifying that he or she has personal knowledge that TFL has established operating procedures that are adequate to ensure compliance with the FCC's CPNI regulations.
- TFL prepares an Accompanying Statement detailing how operating procedures ensure compliance with CPNI regulations.
- TFL provides, if applicable, an explanation of any actions taken against data brokers.
- TFL provides, if applicable, a summary of all customer complaints received in the past year concerning unauthorized release of CPNI.

#### Customer Notification of CPNI Changes

- TFL only make changes to CPNI upon a customer's request.
- Customers do not have access to CPNI information on-line. However, customers may access and modify their CPNI information by contacting our customer service center.

#### Notification to Law Enforcement and Customers of Unauthorized Access

- TFL notifies the appropriate law enforcement agency of any unauthorized access to a customer's CPNI.
- TFL ensures that all records of any discovered CPNI breaches are kept for a minimum of two (2) years.

#### **STATEMENT OF ACTIONS TAKEN AGAINST DATA BROKERS**

- A. During Calendar Year 2012, the Company has instituted the following proceeding, or filed the following petitions, against data brokers before the Federal Communications Commission:

NONE

- B. During Calendar Year 2012, the Company has instituted the following proceeding, or filed the following petitions, against data brokers before the various Public Utilities Commissions:

NONE

- C. During Calendar Year 2012, the Company has instituted the following proceeding, or filed the following petitions, against data brokers before the following federal or state courts:

NONE

**SUMMARY OF CUSTOMER COMPLAINTS  
REGARDING UNAUTHORIZED RELEASE OF CPNI**

- A. During Calendar Year 2012, the Company has received the following number of customer complaints related to unauthorized access to, or disclosure of, CPNI due to improper access by Company employees:

NONE

- B. During Calendar Year 2012, the Company has received the following number of customer complaints related to unauthorized access to, or disclosure of, CPNI due to improper disclosure to individuals not authorized to receive the information:

NONE

- C. During Calendar Year 2012, the Company has received the following number of customer complaints related to unauthorized access to, or disclosure of, CPNI due to improper access to online information by individuals not authorized to view the information:

NONE

- D. During Calendar Year 2012, the Company has become aware of the following processes that pretexters are using to attempt to access its CPNI:

NONE

# TFL Interstate Long Distance, Inc.

## Statement of Customer Proprietary Network Information Acknowledgement

### Definition of Customer Proprietary Network Information (CPNI)

The term "CPNI" means:

- information that relates to the quantity, technical configuration, type, destination, location, and amount of use of a telecommunications service subscribed to by any customer of a telecommunications carrier, and that is made available to the carrier by the customer solely by virtue of the carrier-customer relationship; and
- information contained in the bills pertaining to telephone exchange service or telephone toll service received by a customer of a carrier; except that such term does not include subscriber list information.

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- identifying the listed names of subscribers of a carrier and such subscribers' telephone numbers, addresses, or primary advertising classifications (as such classifications are assigned at the time of the establishment of such service), or any combination of such listed names, numbers, addresses, or classifications; and
- that the carrier or an affiliate has published, caused to be published, or accepted for publication in any directory format.

### Background

TFL is in the business of providing customers with an interstate long distance service. To provide the long distance service, TFL purchases the minutes from a service provider and then resells the minutes to its customers.

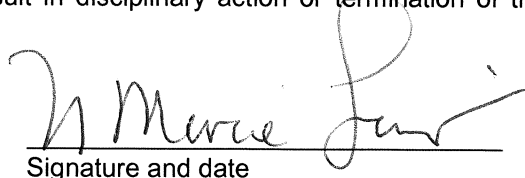
Any and all CPNI related to TFL's service offerings are stored and maintained at the service provider.

Only limited TFL employees, contractors or agents have access to the service providers' database containing the CPNI information.

TFL has a strict policy whereby it does not allow the use of CPNI for any 3<sup>rd</sup> party marketing efforts.

### Employee, Contractors or Agents Acknowledgement

- By signing this Statement, I agree to protect the confidentiality of the CPNI and that I am prohibited to use the CPNI information for any purpose other than addressing customer inquiries or for other internal matters that are NOT related to marketing efforts. Failure to follow the Statement may result in disciplinary action or termination of the relationship with TFL.

  
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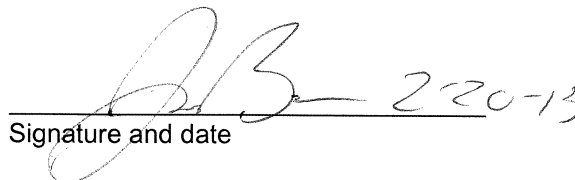
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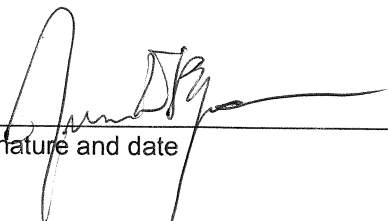
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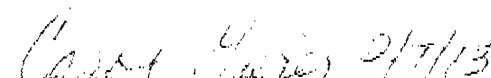
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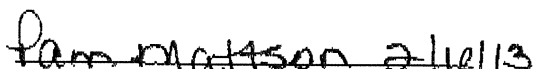
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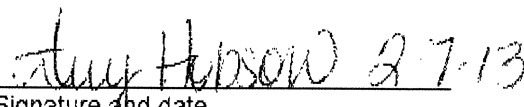
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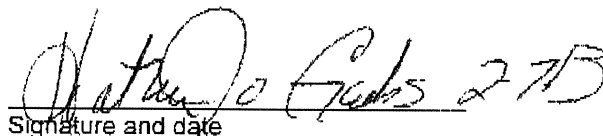
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